

# EXHIBIT 2

# Roller Rebels v. Blakeman (Remand Hours)



Person	Date	Description	Hours
Robert Hodgson			
	4/11/2024	Review respondents' improperly filed removal notice in federal court (EDNY)	0.50
	4/11/2024	Call with GL, MB, CD re response to respondents' improper removal and related case statement in EDNY, next steps	0.50
	4/11/2024	Research re why respondents' removal is clearly improper under black letter law	1.00
	4/12/2024	Review EDNY court decision dismissing Blakeman v James action for removal/remand issue; relatedness; related questions	0.30
	4/12/2024	Review/edit draft letter for EDNY opposing relatedness and raising concerns of impropriety/improper procedure from Nassau	0.50
	4/12/2024	Review/edit draft emails to Nassau counsel re failure to notify, failure to file on NYSCEF, need to contact state court re removal	0.50
	4/12/2024	Research re motion to remand--black-letter law showing Nassau cannot remove here; procedure for motion	1.00
	4/12/2024	Meeting with GL, MB, JD re EDNY docket entries, case assignment, missing Nassau civil cover sheet, relatedness issues	1.00
	4/12/2024	Call EDNY clerk re procedural questions re removal, related case issues, procedure for next steps (to seek remand and oppose relatedness)	0.50
	4/12/2024	Review all of Nassau's improper filings in federal court	1.00
	4/16/2024	Review and edit GL draft of motion for remand and for fees	1.70
	4/16/2024	Meet with GL re motion to remand, fees issue, sanctions motion	0.30
	4/17/2024	Review of updated draft to GL MOL ISO motion to remand and for fees, edits	0.50
	4/18/2024	Review Order setting schedule on motion to remand and individual rules on reply	0.10
	4/18/2024	Final review/edits to MOL and Notice of motion to remand; review of individual judge and EDNY rules for filing	0.50
	4/22/2024	Review Nassau filing in EDNY motion to remand; confirm that they have not rescinded removal petition, effect of "mootness" (no effect), next steps	0.50
	4/22/2024	Teams messages with GL re our reply, timing, timing of procedural history, outline for reply brief	0.20
	4/23/2024	Final review of reply, final polishing/edits	0.20
	4/23/2024	Review of GL draft reply ISO remand and fees; edits, shortening, key issues that weigh in our favor; inconsistency of their letter	1.00
	4/25/2024	Review Court decision granting motion to remand and fees/costs/expenses.	0.20
	4/26/2024	Meeting with GL re collecting fees, identifying expenses, following terms of federal court order re expenses and fees covered	0.30

5/8/2024	Research re reasonable rates and time spent on remand motion in recent EDNY/SDNY cases	1.00
5/8/2024	Review/edit GL email re remand fees negotiation.	0.10
5/8/2024	Draft and file letter request for extension of time to file fees application in light of Nassau's new position	0.20
5/8/2024	Attempt to call opposing counsel re remand fees issue (VM)	0.10
5/13/2024	Additional research on EDNY and SDNY rates and hours spent on remand motion for fees.	1.00
5/14/2024	Review all exhibits to Hodgson affirmation ISO fees, rates, and hours (resumes, relevant experience) and cross-check with cited authorities	1.00
5/14/2024	Draft Hodgson affirmation ISO fees, rates, and hours	2.00
5/14/2024	Draft fees application MOL ISO rates and hours.	3.00
5/15/2024	Finalize declaration (facts asserted ISO fees, all relevant discussion of fees requested, correct math)	1.00
5/15/2024	Edit MOL in light of MB and GL edits, comments. Near-final draft.	1.00
5/15/2024	Review all billed hours for excessive/redundant/non-removal-related entries and remove from request	0.50
<b>Bobby Hodgson Total:</b>		<b>23.20</b>